

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In Re:	)	Case No. 19 B 15036
	)	
RONNIE RUSH,	)	Chapter 7
	)	
Debtor.	)	Hon. LaShonda A. Hunt

**NOTICE OF MOTION OF FIRST INVESTORS FINANCIAL SERVICES  
TO MODIFY AUTOMATIC STAY**

VIA ELECTRONIC NOTICE:

To: Andrew J. Maxwell, Esq. (Trustee) Maxwell Law Group 3010 North California Avenue Chicago, Illinois 60618	David M. Siegel, Esq. (Debtor's Counsel) David M. Siegel & Associates 790 Chaddick Drive Wheeling, Illinois 60090
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VIA U.S. MAIL:

To: Ronnie Rush (Debtor)  
8715 South Marshfield  
Chicago, Illinois 60620

Please take notice that on the 13<sup>th</sup> day of June, 2019 at 10:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable LaShonda A. Hunt, or any judge sitting in his/her stead, in Courtroom 719 of the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, and then and there present the attached ***Motion of First Investors Financial Services to Modify Automatic Stay***, which has been electronically filed this date with the Clerk of the U.S. Bankruptcy Court for the Northern District of Illinois, a copy of which is hereby served upon you by electronic notice or U.S. Mail.

Respectfully submitted,

FIRST INVESTORS FINANCIAL SERVICES,  
Creditor,

By: /s/ Cari A. Kauffman  
One of its attorneys

David J. Frankel (Ill. #6237097)  
Cari A. Kauffman (Ill. #6301778)  
Sorman & Frankel, Ltd.  
180 North LaSalle Street, Suite 2700  
Chicago, Illinois 60601  
(312) 332-3535  
(312) 332-3545 (facsimile)

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice along with the attached Motion upon the above-named persons by electronic filing or, as noted above, by placing same in a properly addressed and sealed envelope, postage prepaid, and depositing it in the United States Mail at 180 North LaSalle Street, Chicago, Illinois on this 5<sup>th</sup> day of June, 2019, before the hour of 5:00 p.m.

/s/ Cari A. Kauffman

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RONNIE RUSH,	)	Chapter 7
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Debtor.	)	Hon. LaShonda A. Hunt

**MOTION OF FIRST INVESTORS FINANCIAL SERVICES  
TO MODIFY AUTOMATIC STAY**

FIRST INVESTORS FINANCIAL SERVICES (“First Investors”), a creditor herein, by its attorneys, the law firm of Sorman & Frankel, Ltd., respectfully requests this Court, pursuant to Section 362 of the Bankruptcy Code, 11 U.S.C. §362 (West 2019), and such other Sections and Rules may apply, to enter an Order modifying the automatic stay provided therein. In support thereof, First Investors states as follows:

1. On May 24, 2019, Ronnie Rush (“Debtor”) filed a Voluntary Petition for Relief under Chapter 7 of the Bankruptcy Code.
2. First Investors is a creditor of the Debtor with respect to a certain indebtedness secured by a lien upon a 2013 Cadillac XTS motor vehicle bearing a Vehicle Identification Number of 2G61P5S30D9113773 (the “Vehicle”). (See Ex. “A”).
3. The current total outstanding balance due to First Investors from the Debtor for the Vehicle is \$20,952.78.
4. Debtor has failed to provide First Investors with proof of full coverage insurance for the Vehicle listing First Investors as the lienholder/loss payee and has failed to make required payments to First Investors due on and after February 13, 2019.

5. As such, First Investors seeks relief from the automatic stay so that First Investors may take possession of and sell the Vehicle and apply the sales proceeds to the balance due from Debtor.

6. Debtor has not offered, and First Investors is not receiving, adequate protection for its secured interest or depreciating value. Further, Debtor has no equity in the Vehicle and the Vehicle is not necessary to an effective reorganization by Debtor.

7. First Investors will suffer irreparable injury, harm, and damage should it be delayed in taking possession of the Vehicle and foreclosing its security interest therein.

8. First Investors requests that Bankruptcy Rule 4001(a)(3) not apply to any Order granting this Motion.

**WHEREFORE,** First Investors Financial Services respectfully requests that this Court enter an Order, as attached hereto, modifying the automatic stay provided by Section 362 of the Bankruptcy Code to permit First Investors to take immediate possession of and foreclose its security interest in the 2013 Cadillac XTS motor vehicle bearing a Vehicle Identification Number of 2G61P5S30D9113773; and, for such other, further, and different relief as this Court deems just and proper.

Respectfully submitted,

FIRST INVESTORS FINANCIAL SERVICES,  
Creditor,

By: /s/ Cari A. Kauffman  
One of its attorneys

David J. Frankel (Ill. #6237097)  
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